

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**SEN ZHANG,**

**Plaintiff,**

**v.**

**THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A TO THE  
COMPLAINT,**

**Defendants.**

Civil Action No. 24-cv-6834

**Presiding: Jeremy C. Daniel**

**Magistrate: Shiela M. Finnegan**

**PLAINTIFF'S EX PARTE MOTION FOR ENTRY OF A  
TEMPORARY RESTRAINING ORDER AND EXPEDITED DISCOVERY**

In this infringement action brought pursuant to the Copyright Act, 17 U.S.C. § 101, Plaintiff seeks entry of an *ex parte* temporary restraining order (i) enjoining Defendants from making, using, offer for sale, selling, and/or importing products the design of which infringe Plaintiff's U.S. Copyright in Exhibit 1 to the Complaint; (ii) instituting a temporary asset restraint; and (iii) ordering expedited discovery. A Memorandum of Law in support of this Motion is submitted herewith.

Date: August 6, 2024

Respectfully submitted,

By: /s/ Abby Neu

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